

**III. Noncommercial Underwriting Announcements And On-Air Funding Drives Should Be Excluded From The Simulcasting Requirement.**

The Commission preliminarily decided in the Third Notice to impose a 50% simulcasting requirement one year after the six-year application/construction period ends and a 100% simulcasting requirement two years later. Third Notice, ¶64. It proposes to define simulcasting as "the broadcast on the NTSC channel, within 24 hours, of the same basic material as that broadcast on the ATV channel, with the exclusion of commercials and promotions." Id., ¶ 72. The Commission proposes excluding commercials and promotions from the scope of the requirement to "allow broadcasters to experiment with ATV production and to maximize revenues to finance the transition to ATV." Id.

Public Television suggests that the Commission also exclude from the simulcasting requirement noncommercial underwriting acknowledgements -- for both general support and specific program underwriting -- and on-air funding drives.<sup>39/</sup> Just as commercial stations should be afforded flexibility to tap different funding sources for their NTSC and ATV channels, so too should noncommercial stations be afforded the flexibility to seek

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<sup>39/</sup> If the Commission adopts the processing procedures suggested by public television in Sections I and II of these Comments, the Commission could subject public television licensees to the same simulcast requirements imposed on commercial licensees. Thus, assuming the Commission does not revise the simulcast requirements at one of the proposed review stages, public television stations which commence ATV operation in the seventh year would be required to simulcast 50% of their ATV programs and stations which commence ATV operation after the seventh year would be required to simulcast 100% of their ATV programs.

different supporters for their NTSC and ATV program services, and to experiment with different on-air funding drives on their NTSC and ATV channels. Thus, public television stations should be permitted to broadcast different programming on their ATV and their NTSC channels when they are engaged in on-air fundraising.<sup>40/</sup>

Exempting such material from the simulcasting requirement will not jeopardize the Commission's goal of assuring that both NTSC and ATV channels provide the same basic program service. Non-simulcast underwriting acknowledgements and on-air fundraising drives, including the limited number of special programs aired by noncommercial stations during fundraising drives, will not create a different program service or impair the Commission's ability to require that licensees surrender their NTSC authorizations at the end of the transition. Accordingly, public television licensees should not be deprived of the flexibility to experiment with ATV production and revenue producing techniques and to demonstrate during fundraising activities some of the unique attributes of ATV technology.

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<sup>40/</sup> Public television stations typically acquire special programs for fundraising purposes. Examples of such programming include the Three Tenors and The Peter Paul and Mary Concert. Under Public Television's proposal, these programs would be exempt from the simulcasting requirement.

**IV. The Commission Should Permit Ancillary Uses Of ATV Channels Provided The Channels Are Used For ATV Broadcasting, But Should Not Impose Minimum Operating Hours TV On Public Television Stations.**

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The Commission seeks comment on whether it should permit ancillary uses of ATV channels, such as those which have used the vertical blanking interval, subsidiary communication authorizations, and second audio programming. Those ancillary uses are now permitted on NTSC channels.<sup>41/</sup> It observes that such ancillary uses may help spur development of the new technology, particularly during the early stages when receiver penetration is low.<sup>42/</sup> It expresses some concern, however, that ancillary uses not be allowed to predominate over the primary use of the channel for ATV, and asks whether it should impose some minimum operating schedule on ATV stations, as it currently imposes on commercial NTSC stations under Section 73.1740(a)(2) of its rules.

Public Television supports allowing all ATV stations the flexibility to provide a variety of ancillary services as long as the channel is used for ATV service. There is no reason to restrict the extensive use of ATV spectrum for these additional services, provided it does not interfere with the provision of ATV service. ATV spectrum could be productively used to provide program-related ancillary services such as multi-language closed captioning for the hearing impaired, descriptive video services

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<sup>41/</sup> Third Report, ¶ 77.

<sup>42/</sup> Id.

not adopt regulatory restrictions that would impair the ability of public television stations and others to expand the range of services they can offer using their ATV channels. As long as the station's ATV facilities are used for ATV programming, the Commission's rules should not artificially constrain stations in making the fullest use of the program opportunities presented by this extremely flexible and adaptable technology.

Public Television opposes, however, any minimum operating hours for noncommercial ATV stations. Under Section 73.1740 of the Commission's rules, noncommercial television stations, unlike commercial stations, are not required to operate on a regular schedule and no minimum hours of operation are specified.<sup>44/</sup> The Commission exempted noncommercial stations from the minimum operating hours requirement in part because of financial considerations. Similar considerations obtain with respect to ATV operation. For many public television stations, the costs of ATV studio and production facilities will limit their ATV hours of operation to ATV programming made available by PBS and others. Those stations should not be forced to take ATV programs offered by others that they believe to be of little interest to their communities merely to meet an FCC-imposed minimum ATV operating requirement. The fact that hours of operation during a license term are taken into account at renewal time should be sufficient

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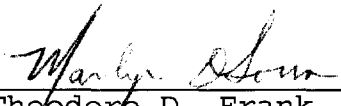
<sup>44/</sup> See 47 C.F.R. § 73.1740(b).

to ensure that stations use their ATV channels to provide ATV service.<sup>45/</sup>

### CONCLUSION

For the foregoing reasons, the Commission (i) should not impose any or, at most, should impose a different financial qualifications requirement on noncommercial applicants for ATV channels than that imposed on commercial applicants; (ii) should coordinate the processing of applications for ATV channels with the grant by NTIA of applications for PTFP funds; (iii) should exclude from the simulcasting requirement noncommercial underwriting announcements and on-air fund drives; and (iv) should permit ancillary uses of ATV channels but should not impose on noncommercial stations any requirement for minimum hours of operation.

Respectfully submitted,

  
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<sup>45/</sup> See id. If the Commission believes that imposing minimum hours of operation is necessary to assure that ATV facilities are used for ATV broadcast purposes and not for "ancillary" uses, it might adopt requirements similar to those that apply to ITFS facilities being used for ancillary purposes. Under Section 74.931(e), minimum operating hours are imposed on ITFS stations only when the licensee uses excess capacity for non-ITFS purposes. See 47 C.F.R. §74.931(e).

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## Exhibit 1

### List of Public Television Licensees and Stations by Type

#### Community-based, non-profit, noncommercial stations

Licensee	Station(s)	
Alaska Public Television, Inc.	KAKM	Anchorage
Bethel Broadcasting, Inc.	KYUK	Bethel
Capital Community Broadcasting, Inc.	KTOO	Juneau
Rural California Broadcasting Corporation	KRCB	Cotati-Rohnert Park
Redwood Empire Public Television, Inc.	KEET	Eureka
Valley Public Television, Inc.	KVPT	Fresno
Community Television of Southern California	KCET	Los Angeles
Northern California Educational Television Association, Inc.	KIXE	Redding
KVIE, Inc.	KVIE	Sacramento
KQED, Inc.	KQED	San Francisco
Minority Television Project, Inc.	KMTP	San Francisco
KTEH-TV Foundation	KTEH	San Jose
Front Range Educational Media Corporation	KBDI	Broomfield
Council for Public Television, Channel 6, Inc.	KRMA	Denver
Connecticut Public Broadcasting, Inc.	WEDN	Norwich
	WEDY	New Haven
	WEDH	Hartford
	WEDW	Bridgeport
	WETA	Washington
The Greater Washington Educational Telecommunications Association, Inc.		
South Florida Public Telecommunications, Inc.	WXEL	West Palm Beach
WJCT, Inc.	WJCT	Jacksonville
Community Television Foundation of South Florida, Inc.	WPBT	Miami
Community Communications, Inc.	WMFE	Orlando
Florida West Coast Public Broadcasting, Inc.	WEDU	Tampa
Chicago Educational Television Association	WTTW	Chicago
West Central Illinois Educational Telecommunications Corporation	WQEC	Quincy
	WMEC	Macomb
	WSEC	Jacksonville
Illinois Valley Public Telecommunications Corporation	WTVP	Peoria
Southwest Indiana Public Broadcasting, Inc.	WNIN	Evansville
Fort Wayne Public Television, Inc.	WFWA	Ft. Wayne
Metropolitan Indianapolis Public Broadcasting, Inc.	WFYI	Indianapolis
Northwest Indiana Public Broadcasting, Inc.	WYIN	Gary-Merrillville
Michiana Public Broadcasting Corporation	WNIT	South Bend
Smoky Hills Public Television	KSWK	Lakin
	KOOD	Hays-Bunker Hill
Kansas Public Telecommunications Service, Inc.	KPTS	Hutchinson-Wichita
Fifteen Telecommunications, Inc.	WKPC	Louisville
Educational Broadcasting Foundation, Inc.	WLAE	New Orleans
Greater New Orleans Educational Television Foundation	WYES	New Orleans
Colby-Bates-Bowdoin Educational Telecasting Corporation	WCBB	Augusta-Lewiston

WGBH Educational Foundation	WGBX	Boston
	WGBH	Boston
	WGBY	Springfield
Detroit Educational Television Foundation	WTVS	Detroit
West Central Minnesota ETV Company	KWCM	Appleton
Northern Minnesota Public Television, Inc.	KAWB	Brainerd
	KAWF	Bemidji
Duluth-Superior Area Educational Television Corporation	WDSE	Duluth
Twin Cities Public Television, Inc.	KTCI	St. Paul-Minneapolis
	KTCA	St. Paul-Minneapolis
Public Television 19, Inc.	KCPT	Kansas City
St. Louis Regional Educational and Public Television Commission	KETC	St. Louis
Ozark Public Telecommunications, Inc.	KOZK	Springfield
	KOZJ	Joplin
Channel 5 Public Broadcasting, Inc.	KNPB	Reno
WSKG Public Telecommunications Council	WSKG	Binghamton
Western New York Public Broadcasting Association	WNEQ	Buffalo
	WNED	Buffalo
Long Island Educational TV Council, Inc.	WLIW	Garden City-Plainview
Educational Broadcasting Corporation	WNET	New York-Newark NJ
Northeast New York Public Telecommunications Council, Inc.	WCFE	Plattsburgh
WXXI Public Broadcasting Council	WXXI	Rochester
WMHT Educational Telecommunications, Inc.	WMHT	Schenectady
	WMHX	Albany-Schenectady
The Public Broadcasting Council of Central New York, Inc.	WCNY	Syracuse
St. Lawrence Valley Educational Television Council Inc.	WNPE	Watertown
	WNPI	Norwood
Charlotte-Mecklenburg Public Broadcasting Authority	WTVI	Charlotte
Prairie Public Broadcasting, Inc.	KWSE	Williston
	KSRE	Minot
	KGFE	Grand Forks
	KFME	Fargo
	KDSE	Dickinson
	KBME	Bismarck
Northeastern Educational Television of Ohio, Inc.	WNEO	Alliance
	WEAO	Akron
Greater Cincinnati Television Educational Foundation	WCET	Cincinnati
The Educational Television Association of Metropolitan Cleveland	WVIZ	Cleveland
Greater Dayton Public Television, Inc.	WPTO	Oxford
	WPTD	Dayton
The Public Broadcasting Foundation of Northwest Ohio	WGTE	Toledo
Southern Oregon Public Television, Inc.	KFTS	Klamath Falls
	KSYS	Medford
Redwood Empire Public Television, Inc.	KEPB	Eugene
Lehigh Valley Public Telecommunications Corporation	WLVT	Allentown
Public Broadcasting of Northwest Pennsylvania, Inc.	WQLN	Erie
WITF, Inc.	WITF	Harrisburg
WHYY, Inc.	WHYY	Wilmington-Philadelphia PA
	WDPB	Seaford



Independence Public Media of Philadelphia, Inc. QED Communications	WYBE WQED WQEX WVIA	Philadelphia Pittsburgh Pittsburgh Wilkes Barre-Scranton
Northeastern Pennsylvania Educational Television Association		
The Greater Chattanooga Public Television Corporation	WTCI	Chattanooga
East Tennessee Public Communications Corporation	WKOP WSJK WLJT WKNO WCTE KLRU KLRN KEDT KERA KDTN KCOS KMBH WVTA WVTB WVER WETK WNVT	Knoxville Sneedville-Knoxville Lexington-Martin Memphis Cookeville Austin San Antonio Corpus Christi Dallas Denton El Paso Harlingen Windsor St. Johnsburg Rutland Burlington Goldvein-Falls Church
West Tennessee Public Television Council, Inc.		
The Mid-South Public Communications Foundation		
Upper Cumberland Broadcast Council		
Capital of Texas Public Telecommunications Council		
Alamo Public Telecommunications Council		
South Texas Public Broadcasting System		
North Texas Public Broadcasting, Inc.		
El Paso Public Television Foundation		
RGV Educational Broadcasting, Inc.		
Vermont ETV, Inc.		
Central Virginia Educational Telecommunications Corporation		
	WNVC WHTJ WCVW WCVE WVPT WHRO	Fairfax Charlottesville Richmond Richmond Staunton-Harrisonburg Hampton-Norfolk
Shenandoah Valley Educational Television Corporation		
Hampton Roads Educational Telecommunications Association, Inc.		
Blue Ridge Public Television, Inc.	WBRA WSBN WMSY KCTS KYVE	Roanoke Norton Marion Seattle Yakima
KCTS Television		
Central Washington Association for Public Telecommunications		
Guam Educational Telecommunications Corporation	KGTF WQTO WMTJ	Agana Ponce Fajardo
Fundacion Educativa Ana G. Mendez		

## College and university stations

Licensee	Station(s)	
University of Alaska	KUAC	Fairbanks
Arizona Board of Regents for and on behalf of Arizona State University	KAET	Phoenix
University of Arizona	KUAS KUAT	Tucson Tucson
Board of Trustees, Coast Community College District	KOCE	Huntington Beach
San Bernardino Community College District	KVCR	San Bernardino
San Diego State University	KPBS	San Diego

San Mateo County Community College District	KCSM	San Mateo
University of Southern Colorado	KTSC	Pueblo
Howard University Board of Trustees	WHMM	Washington
Brevard Community College	WBCC	Cocoa Beach
Coastal Educational Broadcasters, Inc.	WCEU	New Smyrna Beach-
		Daytona
Board of Regents, State of Florida, acting for and on	WUFT	Gainesville
behalf of the University of Florida		
District Board of Trustees, Pensacola Junior College	WSRE	Pensacola
Board of Regents of Florida, acting for and on behalf of	WFSU	Tallahassee
Florida State University		
University of South Florida	WFSG	Panama City
	WSFP	Ft. Myers
Board of Trustees, Southern Illinois University	WUSF	Tampa
Eastern Illinois University	WSIU	Carbondale
Board of Trustees, Community College District #508	WEIU	Charleston
Black Hawk College	WYCC	Chicago
	KQCT	Davenport
Board of Trustees, Southern Illinois University	WQPT	Moline
The Board of Trustees of the University of Illinois	WUSI	Olney
Trustees of Indiana University	WILL	Urbana
Ball State University	WTIU	Bloomington
Board of Trustees for the Vincennes University	WIPB	Muncie
Washburn University of Topeka	WVUT	Vincennes
Western Kentucky University	KTWU	Topeka
University of Maine System	WKYU	Bowling Green
	WMEM	Presque Isle
	WMEB	Orono-Bangor
	WMED	Calais
	WMEA	Biddeford-Portland
Board of Trustees, Michigan State University	WKAR	East Lansing
The Regents of the University of Michigan	WFUM	Flint
Board of Control, Grand Valley State University	WGVK	Kalamazoo
	WGVU	Grand Rapids-Allendale
Board of Control of Northern Michigan University	WNMU	Marquette
Central Michigan University	WCMU	Mt. Pleasant
	WCMW	Manistee
	WCMV	Cadillac
	WCML	Alpena
Delta College	WUCM	University Center
	WUCX	Bad Axe
Central Missouri State University Board of Regents	KMOS	Sedalia-Warrensburg
Montana State University	KUSM	Bozeman
The University of Nebraska	KUON	Lincoln
University of New Hampshire	WLED	Littleton
	WEKW	Keene
	WENH	Durham
Regents of the University of New Mexico and the Board	KNME	Albuquerque
of Education of the City of Albuquerque		
Regents of New Mexico State University	KRWG	Las Cruces
Eastern New Mexico University	KENW	Portales
University of North Carolina Center for Public	WUNL	Winston-Salem
Television		
	WUNJ	Wilmington

	WUNP	Roanoke Rapids
	WUNE	Linville
	WUNM	Jacksonville
	WUNK	Greenville
	WUNG	Concord
	WUND	Columbia
	WUNC	Chapel Hill
	WUNF	Asheville
Ohio University	WOUC	Cambridge
	WOUB	Athens
Bowling Green State University	WBGU	Lima-Bowling Green
The Ohio State University	WPBO	Portsmouth
	WOSU	Columbus
Rogers State College	KRSC	Claremore
The Pennsylvania State University	WPSX	Clearfield-University Park
Amarillo Junior College District	KACV	Amarillo
Texas A&M University	KAMU	College Station
The University of Houston	KUHT	Houston
Central Texas College	KNCT	Belton-Killeen
Texas Tech University	KTXT	Lubbock
Odessa Junior College District	KOCV	Odessa
Central Texas College	KCTF	Waco
Utah State Board of Regents	KULC	Ogden
Brigham Young University	KBYU	Provo-Salt Lake City
University of Utah	KUED	Salt Lake City
Washington State University	KTNW	Richland
	KWSU	Pullman
Board of Regents of the University of Wisconsin System	WHA	Madison
Milwaukee Area District Board of Vocational, Technical and Adult Education	WMVT	Milwaukee
	WMVS	Milwaukee
Central Wyoming College	KCWC	Lander-Riverton

## Local authority stations

Licensee	Station(s)	
Los Angeles Unified School District	KLCS	Los Angeles
The School Board of Dade County, Florida	WLRN	Miami
The Atlanta Board of Education	WPBA	Atlanta
Independent School District No. 492	KSMQ	Austin
Clark County School District	KLVX	Las Vegas
New York City Board of Education	WNYE	Brooklyn
Metropolitan Board of Public Education of Davidson County, Nashville, TN	WDCN	Nashville
Spokane School District No. 81	KSPS	Spokane

## State Board of Education stations

Licensee	Station(s)	
Alabama Educational Television Commission	WCIQ	Mt. Cheaha
	WAIQ	Montgomery
	WEIQ	Mobile
	WGIQ	Louisville-Texasville
	WHIQ	Huntsville
	WFIQ	Florence-Russellville
	WDIQ	Dozier
	WIIQ	Demopolis
	WBIQ	Birmingham
	KEMV	Mountain View
Arkansas Educational Television Commission	KETS	Little Rock
	KETJ	Jonesboro
	KAFT	Fayetteville
	KETG	Arkadelphia
Georgia Public Telecommunications Commission	WGTV	Atlanta
	WCES	Wrens-Augusta
	WXGA	Waycross-Valdosta
	WVAN	Savannah-Pembroke
	WABW	Pelham-Albany
	WACS	Dawson-Americus
	WJSP	Columbus-Warm Springs
	WDCO	Cochran-Macon
	WCLP	Chatsworth-Dalton
	KMEB	Wailuku
Hawaii Public Broadcasting Authority	KHET	Honolulu
State Board of Education, State of Idaho	KUID	Moscow
	KAID	Boise
	KISU	Pocatello
Iowa Public Broadcasting Board	KRIN	Waterloo
	KSIN	Sioux City
	KHIN	Red Oak
	KYIN	Mason City
	KIIN	Iowa City
	KTIN	Ft. Dodge
	KDIN	Des Moines
	KBIN	Council Bluffs
	WKSO	Somerset
	WKPI	Pikeville
Kentucky Authority for Educational Television	WKPD	Paducah
	WKON	Owenton
	WKOH	Owensboro-Henderson
	WKMU	Murray
	WKMR	Morehead
	WKMA	Madisonville
	WKMJ	Louisville
	WKLE	Lexington
	WKHA	Hazard
	WKZT	Elizabethtown
	WCVN	Covington

Louisiana Educational Television Authority	WKGB	Bowling Green
	WKAS	Ashland
	KLTS	Shreveport
	KLTM	Monroe
	KLTL	Lake Charles
Maryland Public Broadcasting Commission	KLPB	Lafayette
	WLPB	Baton Rouge
	KLPA	Alexandria
	WCPB	Salisbury
	WGPT	Oakland
Mississippi Authority for Educational Television	WWPB	Hagerstown
	WFPT	Frederick
	WMPB	Baltimore
	WMPT	Annapolis
	WMAV	Oxford
Nebraska Educational Telecommunications Commission	WMAB	Mississippi State
	WMAW	Meridian
	WMPN	Jackson
	WMAO	Greenwood
	WMAU	Bude
New Jersey Public Broadcasting Authority	WMAE	Booneville
	WMAH	Biloxi
	KYNE	Omaha
	KPNE	North Platte
	KXNE	Norfolk
Oklahoma Educational Television Authority	KRNE	Merriman
	KLNE	Lexington
	KHNE	Hastings
	KMNE	Bassett
	KTNE	Alliance
State of Oregon acting by and through the Oregon Commission on Public Broadcasting	WNJT	Trenton
	WNJB	New Brunswick-Warren
	WNJM	Montclair-Little Falls
	WNJS	Camden-Waterford Works
	KOED	Tulsa
Rhode Island Public Telecommunications Authority	KETA	Oklahoma City
	KOET	Eufala
	KWET	Cheyenne
	KTLC	Oklahoma City
	KOPB	Portland
South Carolina Educational Television Commission	KTVR	La Grande
	KOAC	Corvallis
	KOAB	Bend
	WSBE	Providence
	WNEH	Greenwood
	WNTV	Greenville
	WJPM	Florence
	WHMC	Conway
	WRLK	Columbia
	WITV	Charleston
	WEBA	Allendale-Barnwell
	WJWJ	Beaufort
	WNSC	Rock Hill

State Board of Directors for Educational Television	WRET	Spartanburg
	WRJA	Sumter
	KESD	Brookings
	KBHE	Rapid City
	KTSD	Pierre
	KZSD	Martin
	KQSD	Lowry
	KPSD	Eagle Butte-Faith
	KDSD	Aberdeen
	KUSD	Vermillion
State Board for Community and Technical Colleges	KBTC	Tacoma
West Virginia Educational Broadcasting Authority	KCKA	Centralia
	WSWP	Grandview-Beckley
Wisconsin Educational Communications Board	WPBY	Huntington
	WNPB	Morgantown
	WHRM	Wausau
	WLEF	Park Falls
	WHWC	Menomonie-Eau Claire
	WHLA	La Crosse
	WPNE	Green Bay
Office of Public Information, Government of American Samoa	KVZK	Pago Pago
The Puerto Rico Broadcasting Corporation	WIPR	San Juan
Virgin Islands Public Television System	WIPM	Mayaguez
	WTJX	St. Croix

**Exhibit 2**

**AVERAGE REVENUE PROFILES FOR PUBLIC TELEVISION RECIPIENTS OF  
CPB GRANTS, BY LICENSEE TYPE  
FISCAL YEAR 1989**

**ALL GRANTEE'S AVERAGE REVENUES (ALL OPERATING BUDGET SIZES):**

Federal-Direct	154,207	2%	61,507	2%	18,479	1%	134,339	2%	115,485	2%
CPB-CSC	670,359	8%	473,648	13%	509,302	14%	615,698	9%	592,019	9%
CPB Other	296,879	4%	59,024	2%	9,554	•	27,958	•	164,402	3%
Annenberg/CPB Proj.	41,849	1%	1,057	•	0	0%	942	•	20,334	•
Public Broadcast Ent.	552,374	7%	74,406	2%	18,444	1%	58,934	1%	295,923	5%
Local Government	113,308	1%	133,539	4%	2,045,539	57%	64,141	1%	201,199	3%
State Government	833,498	10%	389,588	10%	260,343	7%	4,180,287	62%	1,219,376	19%
State College	36,683	•	1,057,336	28%	5,355	•	52,742	1%	358,806	6%
Other Public College	8,724	•	124,315	3%	5,278	•	4,818	•	44,265	1%
Private College	17,403	•	171,749	5%	779	•	252	•	62,334	1%
Foundation	442,765	5%	58,119	2%	24,894	1%	324,762	5%	282,970	4%
Business	1,859,310	23%	253,562	7%	178,875	5%	209,835	3%	1,004,373	16%
Subscription	2,176,754	26%	629,590	17%	300,208	8%	671,706	10%	1,354,963	21%
Auction	195,143	2%	65,259	2%	56,377	2%	4,750	•	116,460	2%
All Other	880,282	11%	206,558	6%	142,604	4%	422,764	6%	558,752	9%
Total	8,279,541	100%	3,759,257	100%	3,576,031	100%	6,773,926	100%	6,391,662	100%
(Number of Grantees)	92		61		9		32		194	

\*Less than 0.5 percent.

Note: A sum of items may not add up to a total due to rounding. All financial data in this table are preliminary.

Data for a category represented by less than three grantees are not presented in this table.

Source: CPB, Policy Development and Planning, June 1990



**AVERAGE REVENUE PROFILES FOR PUBLIC TELEVISION RECIPIENTS OF  
CPB GRANTS, BY LICENSEE TYPE  
FISCAL YEAR 1990**

**ALL GRANTEEES' AVERAGE REVENUES (ALL OPERATING BUDGET SIZES):**

Federal Direct	188	2.2%	58	1.5%	36	0.9%	164	2.3%	135	2.0%
CPB CSG	711	8.3%	488	12.4%	521	12.6%	616	8.5%	615	9.2%
CPB NPPAC and Other	284	3.3%	57	1.4%	8	"	17	"	154	2.3%
Annenberg/CPB Proj.	21	"	1	"	0	0.0%	6	"	11	"
Public Brdcastg Ent.	602	7.0%	88	2.2%	46	1.1%	70	1.0%	324	4.9%
Local Government	142	1.7%	182	4.6%	2,126	51.3%	84	1.2%	237	3.6%
State Government	859	10.0%	388	9.9%	320	7.7%	4,248	58.3%	1,243	18.6%
State College	61	0.7%	1,146	29.2%	2	"	28	"	399	6.0%
Other Public College	10	"	111	2.8%	4	"	1	"	40	0.6%
Private College	17	"	163	4.1%	1	"	0	"	60	0.9%
Foundation	420	4.9%	58	1.5%	43	1.0%	403	5.5%	284	4.3%
Business	1,992	23.2%	254	6.5%	243	5.8%	279	3.8%	1,073	16.1%
Subscribers	2,256	26.3%	651	16.6%	468	11.3%	733	10.1%	1,409	21.1%
Auction	189	2.2%	61	1.6%	47	1.1%	4	"	111	1.7%
All Other	823	9.6%	217	5.5%	283	6.8%	635	8.7%	573	8.6%
Total	8,574	100.0%	3,922	100.0%	4,148	100.0%	7,288	100.0%	6,670	100.0%
(Number of Grantees)	91		62		9		32		194	

\* Less than 0.5 percent.

Note: A sum of items may not add up to a total due to rounding. All financial data in this table are preliminary.

Data for a category represented by less than three grantees are not presented in this table.

Source: CPB, Policy Development and Planning, August 1991

**AVERAGE REVENUE PROFILES FOR PUBLIC TELEVISION RECIPIENTS OF  
CPB GRANTS, BY LICENSEE TYPE  
FISCAL YEAR 1991**

**ALL GRANTEE'S AVERAGE REVENUES:**

Federal Direct	\$177,367	2.0%	\$55,998	1.4%	\$89,447	2.1%	\$146,605	1.9%	\$129,169	1.9%
CPB CSG	\$646,981	7.3%	\$486,405	12.4%	\$532,951	12.4%	\$696,316	9.2%	\$597,868	8.8%
CPB NFPAG and Other	\$233,654	2.7%	\$32,454	0.8%	\$8,128	0.2%	\$20,918	0.3%	\$123,987	1.8%
Armenberg/CPB Proj.	\$26,109	0.3%	\$753	0.0%	\$0	0.0%	\$914	0.0%	\$12,654	0.2%
Other Public Brcdstg Ent.	\$712,270	8.1%	\$70,566	1.8%	\$21,788	0.5%	\$86,751	1.1%	\$372,371	5.5%
Local Government	\$153,409	1.7%	\$154,622	4.0%	\$2,284,371	53.2%	\$105,340	1.4%	\$242,894	3.6%
State Government	\$870,127	9.9%	\$384,694	9.8%	\$250,473	5.8%	\$4,557,725	60.0%	\$1,281,029	18.8%
State College	\$47,469	0.5%	\$1,155,646	29.5%	\$893	0.0%	\$44,424	0.6%	\$403,058	5.9%
Other Public College	\$6,427	0.1%	\$135,415	3.5%	\$3,931	0.1%	\$4,008	0.1%	\$47,616	0.7%
Private College	\$13,318	0.2%	\$176,155	4.5%	\$353	0.0%	\$1,707	0.0%	\$63,486	0.9%
Foundation	\$450,200	5.1%	\$59,800	1.5%	\$32,343	0.8%	\$237,153	3.1%	\$270,585	4.0%
Business	\$2,171,957	24.6%	\$228,031	5.8%	\$180,691	4.2%	\$292,807	3.9%	\$1,149,404	16.8%
Subscribers	\$2,309,778	26.2%	\$665,033	17.0%	\$479,701	11.2%	\$752,753	9.9%	\$1,443,318	21.1%
Auction	\$176,711	2.0%	\$49,319	1.3%	\$39,183	0.9%	\$4,372	0.1%	\$101,430	1.5%
All Other	\$816,040	9.3%	\$256,713	6.6%	\$371,128	8.6%	\$650,399	8.6%	\$588,254	8.6%
<b>Total</b>	<b>\$8,811,816</b>	<b>100.0%</b>	<b>\$3,911,605</b>	<b>100.0%</b>	<b>\$4,295,382</b>	<b>100.0%</b>	<b>\$7,602,192</b>	<b>100.0%</b>	<b>\$6,827,122</b>	<b>100.0%</b>
(Number of Grantees)	93		64		9		32		198	

\* Less than 0.05 percent.

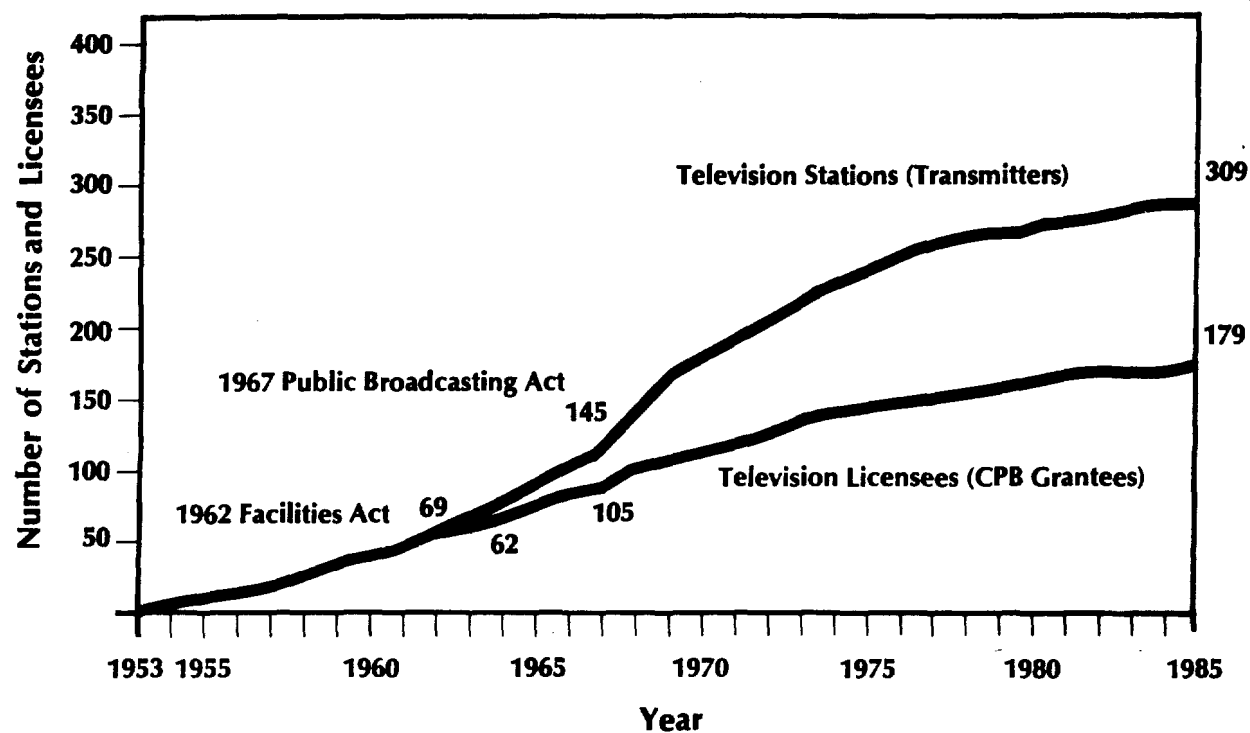
Note: A sum of items may not add up to a total due to rounding. All financial data in this table are preliminary.

Data for a category represented by less than three grantees are not presented in this table.

Source: Corporation for Public Broadcasting, August 1992

**Exhibit 3**

# GROWTH OF PUBLIC TELEVISION LICENSEES AND STATIONS 1953-1985



#### Exhibit 4

##### APPROPRIATIONS FOR PUBLIC TELECOMMUNICATIONS FACILITIES PROGRAM

(In Thousands of Dollars)

Fiscal Year	Appropriation for PTFP
1987	\$20,500
1988	\$21,290
1989	\$20,000
1990	\$20,000
1991	\$21,833
1992	\$22,925
1993	\$21,300

##### TELECOMMUNICATIONS FACILITIES PROGRAM AWARDS TO PUBLIC TELECOMMUNICATIONS ENTITIES FOR TV USE

(In Thousands of Dollars)

Fiscal Year	Awards to Telecom Entities for Television
1987	\$13,873
1988	\$10,151
1989	\$11,402
1990	\$16,570
1991	\$14,683
1992	\$15,607*

Source: Corporation for Public Broadcasting

\*Source: ETV Newsletter, Vol. 26, No. 20., Sept. 28,  
1992, p.1.

Certificate of Service

I, Paula Lust, hereby certify that on this 7th day of January, 1993, I served a true copy of the foregoing Comments of Association of America's Public Television Stations, Corporation for Public Broadcasting, and Public Broadcasting Service by hand delivery to:

Roy J. Stewart, Chief  
Mass Media Bureau  
Federal Communications Commission  
1919 M Street, N.W., Room 314  
Washington, D.C. 20554  
Stop Code 1800

Thomas P. Stanley, Chief Engineer  
Office of Engineering and Technology  
Federal Communications Commission  
2025 M Street, N.W., Room 7002  
Washington, D.C. 20554  
Stop Code 1300

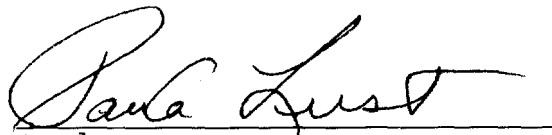
Renee Licht, Acting General Counsel  
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Federal Communications Commission  
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Paula Lust